



STATE OF WISCONSIN  
DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor  
Joel Brennan, Secretary  
Amy Kasper, Division Administrator

March 7, 2019

Taylor Amarel  
[66294-74503093@requests.muckrock.com](mailto:66294-74503093@requests.muckrock.com)

Via Email

Dear Taylor Amarel:

This is in response to your February 25, 2019, public records requests for “the last 200 pages of emails sent to, from, or copied to Ellen Nowak.”

We are unable to fulfill your records request because it fails to meet the criteria of a sufficient request under Wisconsin’s public records law.

Under Wis. Stat. § 19.35(1)(h), a records request is sufficient if it contains a reasonable limitation for both subject matter and length of time. Your request, which asks for “the last 200 pages of emails” for a particular individual without any further limitations, lacks the reasonable limits required. As the Wisconsin Department of Justice has explained, “Requests describing only the format requested (‘all e-mails’) without reasonable limitations as to time and subject matter are often not legally sufficient.” Wisconsin Public Records Law Compliance Guide, at p. 62 (March 2018) (available from <https://www.doj.state.wi.us/office-open-government/office-open-government-resources>); see *State ex rel. Gehl v. Connors*, 2007 WI App 238, ¶23, 306 Wis. 2d 247, 742 N.W.2d 530 (a request that covered “virtually every email” sent and received by certain employees was not valid, in part because it was “not tied to any particular subject matter”).

Pursuant to Wis. Stat. § 19.35(4)(b), we must inform you that if this response constitutes a full or partial written denial of a public records request that was made in writing, the determination is subject to review by mandamus under Wis. Stat. § 19.37, or upon application to the Attorney General or a District Attorney.

Sincerely,

David J. Rabe  
Legal Counsel